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COUNSEL/PARTIES OF RECORD	
May 2, 2022	
CLERK US DISTRICT COURT DISTRICT OF NEVADA	
BY: _____	DEPUTY _____

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Attorney for Plaintiffs
 JESSICA SUEANN GUTIERREZ OSBORNE,
 individually; and FREDRICK WAID, as the
 appointed special administrator of the estate of
 JACKIE RAY HARRY aka JACK GUTIERREZ HARRY

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA (RENO)

JESSICA SUEANN GUTIERREZ OSBORNE,
 individually; and FREDRICK WAID, as the
 appointed special administrator of the estate of
 JACKIE RAY HARRY aka JACK GUTIERREZ
 HARRY,

Plaintiffs,

vs.

PERSHING COUNTY; DEPUTY PHILLIP
 DICKERMAN; SHERIFF JERRY ALLEN;
 DOES 1-10, inclusive; and DEANA MARIE
 HARRY, nominal Defendant,

Defendants.

CASE NO. 3:21-cv-00231-HDM-CSD

ORDER GRANTING
STIPULATION AND ORDER TO
EXTEND DISCOVERY DEADLINES
AND OTHER DEADLINES

(Third Request)

COME NOW, Plaintiffs JESSICA SUEANN GUTIERREZ OSBORNE, individually,
 and FREDRICK WAID, as the appointed special administrator of the estate of JACKIE RAY
 HARRY aka JACK GUTIERREZ HARRY, and DEFENDANTS PERSHING COUNTY,
 DEPUTY PHILLIP DICKERMAN and SHERIFF JERRY ALLEN, by and through their
 undersigned attorneys of record, and hereby move this Court to extend the current discovery and

1 other deadlines for an additional sixty (60) days (except for expert discovery which the parties
 2 request be extended 72 days). This is the parties third request for a continuance of any discovery
 3 or other deadlines in this case. The parties are requesting the extension discussed herein to allow
 4 the parties to complete a private mediation in this case before having to incur attorney's fees and
 5 costs associated with further discovery. The mediation is set for July 8, 2022 before a private
 6 mediator at ARM in Las Vegas. The parties confirm that they have spoken with their respective
 7 clients regarding the proposed stipulation and the parties are in agreement with same. The
 8 parties have served the following discovery:

10	10/14/2021	Plaintiffs' Requests for Admission to Def Pershing County (Set 1)
11	10/14/2021	Plaintiffs' Requests for Production of Documents to Def Pershing County (Set 1)
12	10/14/2021	Plaintiffs' Interrogatories to Def Pershing County (Set 1)
13	1/19/2022	Notice of Subpoena to Produce Documents to Pershing Coroner
14	1/21/2022	Plaintiffs' Requests for Admissions to Defendant Dickerman (Set 1)
15	1/21/2022	Plaintiffs' Requests for Production of Documents to Dickerman (Set 1)
16	1/21/2022	Plaintiffs' Special Interrogatories to Dickerman (Set 1)
17	1/27/2022	Plaintiffs' Requests for Admission to Def Pershing County (Set 2)
18	1/27/2022	Plaintiffs' Interrogatories to Def Pershing County (Set 2)
19	1/27/2022	Plaintiffs' Requests for Production of Documents to Def Pershing County (Set 2)
20	3/11/2022	Defendants Notice of Taking Deposition of Plaintiff Jessica Osborne

21
 22 The parties have served responses and disclosures as follows:

23	9/8/2021	Plaintiffs' Initial Disclosures Per FRCP 26(a)(1)(A)
24	9/21/2021	Defendants' Initial Disclosures Per FRCP 26(a)(1)(A)
25	12/9/2021	Defendant Pershing County's Responses to Plaintiffs' Requests for Admissions (Set 1)
26	12/10/2021	Defendant Pershing County's Responses to Plaintiffs' Requests for Production of Documents (Set 1)
27	12/10/2021	Defendant Pershing County's Responses to Plaintiffs' Interrogatories (Set 1)
28	12/10/2021	Defendants' First Supplemental FRCP 26 Disclosures
	12/14/2021	Defendant Pershing County's Amended Responses to Plaintiffs' Requests for Production of Documents (Set 1)

1 12/14/2021 Defendants' Second Supplemental FRCP 26 Disclosures
2 2/3/2022 Plaintiffs First Supplemental FRCP 26 Disclosures
3 3/24/2022 Deposition of Plaintiff Jessica Osborne

4 Plaintiffs have agreed to wait until after the mediation to take the depositions of principal
5 Defendants and witnesses from Pershing County Sheriff's Department as well as other law
6 enforcement agencies that were present at the scene of Jack Harry shooting death.

7 The parties request that the discovery deadline of **July 1, 2022** be extended to **August 30,**
8 **2022.**

9 The parties request that the deadline for disclosure of expert witnesses of **May 3, 2022** be
10 extended to **July 15, 2022**, and that the deadline for disclosure of rebuttal expert witnesses of
11 **June 3, 2022**, be extended to **August 15, 2022.**

12 The parties request that the deadline for filing dispositive motions of **August 1, 2022**, be
13 extended to **September 30, 2022.**

14 The parties further request that the deadline for filing the pre-trial order of **August 30,**
15 **2022** be extended to **October 31, 2022** (next business day after October 29, 2022, a Saturday).
16 Should a motion for summary judgment be filed, the deadline for filing the pre-trial order shall
17 be thirty (30) days after the Court's order on any such dispositive motion.

18 Dated this 28th day of April, 2022.

DATED this 28th day of April, 2022.

19 PETER GOLDSTEIN LAW CORP.

THORNDAL ARMSTRONG
DELK BALKENBUSH & EISINGER

20 By: /s/ Peter Goldstein

By: /s/ Katherine F. Parks

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Attorney for Defendants
PERSHING COUNTY, PHILLIP
DICKERMAN AND JERRY ALLEN

ORDER

IT IS SO ORDERED.

DATED: This 2 day of May 2022.


UNITED STATES MAGISTRATE JUDGE



Peter Goldstein <pglawstaff@petergoldsteinlaw.com>

stip to extend time on Osborne v Pershing

Katherine F. Parks <KFP@thorndal.com>

Thu, Apr 28, 2022 at 10:37 AM

To: Peter Goldstein <peter@petergoldsteinlaw.com>, Kris Bechtold <pglawstaff@petergoldsteinlaw.com>, "Laura S. Bautista" <lsb@thorndal.com>

Peter:

I do not see a need to add reference to my ~~COVID diagnosis~~. Feel free to file this with my e-signature.

Kathy

Katherine F. Parks | President | Thorndal Armstrong Delk Balkenbush & Eisinger

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